

**REMARKS**

Claims 1-13 are pending and have been examined in the present application. Claims 1-13 have been rejected under 35 U.S.C. § 102(b) over Potter et al. (U.S. Patent 5,787,402). In light of the below remarks, reconsideration of the present application is respectfully requested.

In paragraph 5 of the Office Action, claims 1-13 have been rejected under § 102 over Potter. Applicants respectfully traverse this rejection. Each of independent claims 1 and 6 require receiving a bulk file containing a plurality of funds transfer transactions. Each of the claims further require the grouping of these transactions into those “not requiring foreign exchange operation” and those “funds transfer transactions requiring a foreign exchange operation.” In rejecting this explicit limitation of independent claim 1, the Office Action appears to point to the batch file server 116 as illustrated in Figures 2 and 13. Applicants respectfully disagree that this batch file server 116 reads on the express limitations of independent claim 1.

At column 15, lines 6-46, Potter describes that its batch file server 116 retrieves foreign exchange messages from the financial institution’s mainframe and forwards them onto the payment order server. This structure and process of Potter does not read on the first processor as recited in independent claim 1. As described above, the first processor of independent claim 1 separates the transactions contained in a bulk file from a customer and separates these transactions into those requiring foreign exchange operation and those not requiring foreign exchange operations. As described in Potter, its server 116 merely retrieves foreign exchange transactions from the system’s mainframe and passes them on to the payment order server.

Applicants therefore respectfully submit that far from teaching the system as recited in independent claim 1, it does not even suggest such a system. Withdrawal of the rejection of

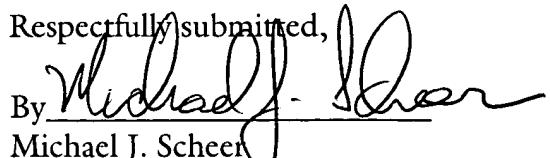
independent claim 1 and its dependent claims 2-5 on the basis of Potter is therefore respectfully requested.

On page 4 of the Office Action, it is stated that claims 6-13 are similarly rejected as claims 1-5. Applicants respectfully traverse these rejections. Independent claim 6 contains the similar limitation as described above with respect to independent claim 1 in that it requires "grouping the plurality of funds transfer transactions into funds transfer transactions requiring foreign exchange operation...and funds transfer transactions not requiring a foreign exchange operation." As described above with respect to independent claim 1, Potter does not teach or suggest this express limitation of independent claim 6. The batch file server 116 of Potter merely performs a transfer of the foreign exchange transactions from the system's mainframe to the payment server. This clearly does not read on, or suggest the process expressly recited in independent claim 6. Applicants therefore respectfully request withdrawal of the rejection of independent claim 6 on the basis of Potter.

As claims 7-13 depend from and contain all the limitations of independent claim 6 as described above, withdrawal of the rejection of these dependent claims for the reasons described above with respect to independent claim 6 is therefore respectfully.

As Applicants have shown each of the claims of the present application are in condition for allowance, such action is earnestly solicited.

Dated: August 28, 2003

Respectfully submitted,  
By   
Michael J. Scheer

Registration No.: 34,425  
DICKSTEIN SHAPIRO MORIN &  
OSHINSKY LLP  
1177 Avenue of the Americas  
41st Floor  
New York, New York 10036-2714

Application No.: 09/438,590

Docket No.: J2167.0125/Pl25

(212) 835-1400  
Attorney for Applicant